

FILED

APR 17 2013

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CLERK
U.S. DISTRICT COURT
MIDDLE DIST. OF ALA.

UNITED STATES OF AMERICA)

v.)

SHATOUBRIOUNE HARE GEORGE)
a/k/a "Tobie")

Defendant.)

CR. NO. 2:13cr66-WKW

[18 U.S.C § 371;
18 U.S.C. § 641;
18 U.S.C. § 981(a)(1)(C)]

INDICTMENT

The Grand Jury charges that:

INTRODUCTION

At all times relevant to this Indictment:

1. Defendant SHATOUBRIOUNE HARE GEORGE, who is also known as "Tobie," resided in Montgomery County, Alabama, within the Middle District of Alabama.

2. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for enforcing and administering the federal tax laws of the United States, and collecting taxes owed to the United States.

COUNT ONE
(Conspiracy)

1. The factual allegations contained in Paragraphs 1 and 2 of the Introduction Section of this Indictment are realleged and incorporated herein as if copied verbatim.

2. Beginning in or about November 2011, and continuing until in or about March 2012, in the Middle District of Alabama, the Defendant SHATOUBRIOUNE HARE GEORGE, Jesse Johnson, Quanesha Johnson, Debora Gray, and others did unlawfully, voluntarily,

intentionally and knowingly conspire, combine, confederate, and agree together and with each other and others to commit the offense of theft of public money, in violation of Title 18, United States Code, Section 641.

MANNER AND MEANS

3. To accomplish the objects of this scheme, Defendant SHATOUBRIOUNE HARE GEORGE and others used the following manner and means, among others:

4. Defendant SHATOUBRIOUNE HARE GEORGE, Jesse Johnson, Quanesha Johnson, and others would and did obtain and caused to be obtained U.S. Treasury tax refund checks that were issued due to the filing of fraudulent tax returns.

5. Defendant SHATOUBRIOUNE HARE GEORGE, Jesse Johnson, Quanesha Johnson, and others would and did cash and caused to be cashed approximately seventy-seven fraudulently obtained U.S. Treasury tax refund checks that totaled approximately \$137,016.24 by bringing them to Debora Gray, a bank teller who worked for a bank in Wetumpka, Alabama.

6. Defendant SHATOUBRIOUNE HARE GEORGE, Jesse Johnson, Quanesha Johnson, and others would and did divide and distribute the proceeds of the scheme amongst themselves and other members of the conspiracy.

OVERT ACTS

7. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed by or caused to be committed by one or more members of the conspiracy, in the Middle District of Alabama, and elsewhere:

8. On or about December 5, 2011, Defendant SHATOUBRIOUNE HARE GEORGE provided or caused to be provided a fraudulently obtained U.S. Treasury tax refund check made payable to C.C in the amount of \$1,300 to Quanesha Johnson.

9. On or about December 5, 2011, Quanesha Johnson cashed a fraudulently obtained U.S. Treasury tax refund check made payable to C.C in the amount of \$1,300.

10. On or about December 8, 2011, Defendant SHATOUBRIOUNE HARE GEORGE provided or caused to be provided a fraudulently obtained U.S. Treasury tax refund check made payable to L.B. in the amount of \$1,300 to Quanesha Johnson.

11. On or about December 8, 2011, Quanesha Johnson cashed a fraudulently obtained U.S. Treasury tax refund check made payable to L.B. in the amount of \$1,300.

12. On or about December 22, 2011, Defendant SHATOUBRIOUNE HARE GEORGE provided or caused to be provided a fraudulently obtained U.S. Treasury tax refund check made payable to C.K. in the amount of \$1,300 to Quanesha Johnson.

13. On or about December 22, 2011, Quanesha Johnson cashed a fraudulently obtained U.S. Treasury tax refund check made payable to C.K. in the amount of \$1,300.

14. On or about February 13, 2012, Defendant SHATOUBRIOUNE HARE GEORGE provided or caused to be provided a fraudulently obtained U.S. Treasury tax refund check made payable to K.F. in the amount of \$1,461 to Jesse Johnson.

15. On or about February 13, 2012, Jesse Johnson cashed a fraudulently obtained U.S. Treasury tax refund check made payable to K.F. in the amount of \$1,461.

16. On or about February 13, 2012, Defendant SHATOUBRIOUNE HARE GEORGE provided or caused to be provided a fraudulently obtained U.S. Treasury tax refund check made payable to J.M. in the amount of \$1,501 to Jesse Johnson.

17. On or about February 13, 2012, Jesse Johnson cashed a fraudulently obtained U.S. Treasury tax refund check made payable to J.M. in the amount of \$1,501.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH SIX
(Theft of Public Money)

1. The factual allegations contained in Paragraphs 1 through 2 of the Introduction Section of this Indictment are realleged and incorporated herein as if copied verbatim.

2. On or about each date listed below, within the Middle District of Alabama, Defendant SHATOUBRIOUNE HARE GEORGE did steal, purloin, and knowingly convert to her own use and the use of another, money of the United States, namely funds administered by the Department of the Treasury in the form of a federal tax refund in the amount and in the name of the individual whose initials are listed below:

Count	Date of Offense	Individual	Amount
TWO	12/05/2011	C.C.	\$1,300
THREE	12/08/2011	L.B.	\$1,300
FOUR	12/22/2011	C.K.	\$1,300
FIVE	02/13/2012	K.F.	\$1,461
SIX	02/13/2012	J.M.	\$1,501

All in violation of Title 18, United States Code, Sections 641 and 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts Two through Six of this Indictment are realleged and incorporated herein as if copied verbatim for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction for the offenses alleged in Counts Two through Six, the Defendant SHATOUBRIOUNE HARE GEORGE shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property constituting or derived from the proceeds said Defendant obtained directly or indirectly as a result of said offenses.

3. If any of the property subject to forfeiture, as a result of any act or omission of the Defendant,


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

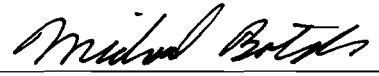
the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), up to the value of the forfeitable property described above.

A TRUE BILL:


Foreperson

GEORGE L. BECK, JR.
United States Attorney


Todd Brown
Assistant United States Attorney


Charles M. Edgar, Jr.
Michael Boteler
Trial Attorneys
United States Department of Justice, Tax Division